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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEXANDRA RASEY-SMITH;
GORDON GENE MACCANI; and
JANET MACCANI,

Plaintiffs,

v.

CITY OF LOS ANGELES; CALEB
GARCIA ALAMILLA; and DOES 2-
10, inclusive,

Defendants.

Case No. 2:24-cv-03265-MWC-SSC
**JOINT STIPULATION AND
REQUEST TO CONTINUE
DISCOVERY IN ORDER TO
MEDIATE**

**[PROPOSED ORDER Submitted
Concurrently]**

Judge: Hon. Michelle Williams Court

Trial Date: April 6, 2026

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9 GORDON GENE MACCANI, and JANET MACCANI
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11 Hydee Feldstein Soto, City Attorney (SBN 106866)
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1 IT IS HEREBY STIPULATED by and between Plaintiffs ALEXANDRA
2 RASEY-SMITH, GORDON GENE MACCANI, JANET MACCANI and
3 Defendants CITY OF LOS ANGELES and CALEB GARCIA ALAMILLA, the
4 parties—through their undersigned counsel, as follows:

5 WHEREAS, this case concerns an officer involved shooting that occurred on
6 February 3, 2024 involving decedent Jason Maccani in the City of Los Angeles;

7 WHEREAS, the defendants CITY OF LOS ANGELES and CALEB
8 GARCIA ALAMILLA have filed Answers to Plaintiffs' Complaint;

9 WHEREAS the parties have agreed to mediate the case in advance of
10 incurring costs associated with extensive discovery;

11 WHEREAS, the parties' full-day mediation session is scheduled for October
12 15, 2025 with Richard Copeland;

13 WHEREAS, the parties would like to continue fact discovery and expert
14 discovery in order to try to resolve this case before discovery;

15 WHEREAS, due to the schedule of the three separate attorneys' offices and
16 the availability of the involved officers (both defendant and non-defendant officers),
17 the parties have been unable to conduct their depositions to date. The parties have
18 propounded and responded to written discovery and have subpoenaed documents
19 from third-parties;

20 WHEREAS, the parties have not requested any prior extensions to the Court's
21 Civil Trial Order [Doc. 30];

22 Therefore, the parties jointly request a continuation of the current relevant
23 discovery dates and deadlines as follows:

	Current Date	Requested Date
Fact Discovery Cut Off	Friday, October 3, 2025	Friday, November 14, 2025
Expert Disclosure Due	Friday, October 10, 2025	Friday, November 21, 2025

1	Expert Disclosure (Rebuttal) Due	Friday, October 24, 2025	December 5, 2025
2	Expert Discovery Cut Off	Friday, November 7, 2025	Friday, December 19, 2025

4 All other Court-ordered dates shall remain in effect.

5 IT IS SO STIPULATED.

6 Dated: August 20, 2025

LAW OFFICES OF DALE K. GALIPO

9 By: /s/ Dale K. Galipo

10 Dale K. Galipo

11 Attorneys for Plaintiffs

12 Dated: August 20, 2025

13 LOS ANGELES CITY ATTORNEY'S
14 OFFICE

16 By: /s/ Ty Ford

17 Ty Ford, Deputy City Attorney

18 Attorneys for City of Los Angeles

19 Dated: August 20, 2025

20 BURKE, WILLIAMS & SORENSEN, LLP

22 By: /s/ Susan E. Coleman

23 Susan E. Coleman

24 Attorneys for Defendant

25 CALEB GARCIA ALAMILLA

ELECTRONIC SIGNATURE CERTIFICATION

I, Susan E. Coleman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the electronic filing.

6 | Dated: August 20, 2025

BURKE, WILLIAMS & SORENSEN, LLP

By: /s/ Susan E. Coleman

Susan E. Coleman
Attorneys for Defendant
CALEB GARCIA ALAMILLA